

# Exhibit 1



LAW FIRM OF  
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ADMITTED: NEW YORK, EIGHTH CIRCUIT  
SECOND CIRCUIT, ALGERIAN BAR  
US COURT ON INTERNATIONAL TRADE

September 25, 2017

**VIA ELECTRONIC & FEDERAL EXPRESS**

Sean Carter, Esq.  
Cozen O'Connor  
One Liberty Place  
1650 Market Street, Suite 2800  
Philadelphia, PA 19103

**RE: In re Terrorist Attacks of September 11, 2001, 03 MDL 1570**

Dear Sean:

On behalf of the World Assembly of Muslim Youth (“WAMY”) we write to inform Plaintiff that we will be seeking an additional 60 days to complete WAMY’s document production. We will be writing a letter to the Court seeking a short conference to discuss this request.

On March 23, 2017, Magistrate Judge Netburn set September 29, 2017, as the deadline for WAMY’s document production. Following that March 23<sup>rd</sup> Order WAMY has produced 363,002 pages.<sup>1</sup> As you are aware WAMY has produced 1,055,362 pages in total.

WAMY has completed its search for discovery documents, and its document production is now almost complete. The vast majority of WAMY’s discovery documents have been produced. Due to the volume of documents, the fact that they are almost all in Arabic, and the fact that we unexpectedly lost an Arabic language reviewer/translator, we will be unable to complete our production by September 29, 2017. We will therefore write to the Court on Wednesday September 27, 2017, seeking a conference with Magistrate Judge Netburn to extend WAMY’s document production deadline by 60 days. We hope Plaintiffs are amenable to WAMY’s request. Also, please let us know your availability for the conference.

<sup>1</sup> On May 2, 2017 WAMY produced 27,785 pages;  
On June 19, 2017 WAMY produced 73,183 pages;  
On July 20, 2017 WAMY produced 124,612 pages;  
On August 23, 2017 WAMY produced 79,953 pages;  
On September 25, 2017 WAMY produced 57,469 pages.

We would like to receive Plaintiffs' position relative to this request as soon as possible so that we can advise the court of the same by the end of business on September 27, 2017. We look forward to your cooperation on this matter. Please do not hesitate to reach out to us with any questions you may have or clarification you may need.

Sincerely,

*Omar T. Mohammedi / EWK*

Omar T. Mohammedi, Esq.

Frederick Goetz, Esq.

Cc: Plaintiffs Executive Committee (via e-mail)  
Alan Kabat, Esq. (via e-mail)